

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

JERRY VANWAGNER

PLAINTIFF

VERSUS

CIVIL ACTION NO. 4:18-CV-150-GAD-RP

CENTURION OF MISSISSIPPI, ET AL

DEFENDANTS

DECLARATION OF NURSE PRACTITIONER ANGELA BROWN

Pursuant to 28 U.S.C. § 1746, I, Nurse Practitioner Angela Brown, declare as follows:

1. I am over the age of twenty-one and am in all respects competent to give testimony under oath. The matters set forth below are based upon my own personal knowledge.
2. I am a Nurse Practitioner at Mississippi State Penitentiary (“MSP”), and I am employed by Centurion of Mississippi, LLC (“Centurion”).
3. Centurion has a contract with the Mississippi Department of Corrections (“MDOC”)¹ to provide certain medical care to inmates in the custody of MDOC.
4. I am familiar with the medical records and treatment of Jerry Vanwagner, MDOC #161751 (“Vanwagner”), and I am familiar with MDOC’s policy regarding the medical treatment provided to inmates diagnosed with Hepatitis C.
5. Based on my review of Vanwagner’s medical records, Vanwagner tested positive for Hepatitis C and has been a patient in MSP’s Chronic Care Program for inmates diagnosed with Hepatitis C. In Chronic Care, medical staff monitors his condition, and Vanwagner has remained in Chronic Care at all times relevant to this Complaint.
6. In Chronic Care, patients’ enzymes levels of the liver are monitored with blood counts and exams for a determination of the signs of disease including ascites and jaundice. This

¹ Centurion’s contract with the MDOC was effective July 1, 2015.



allows medical staff to monitor patients' condition over time, and determine if additional treatment is necessary.

7. One method of measuring a patient's status is to calculate his Fibrosis-4 score. A Fibrosis-4 score is a non-invasive testing method to measure scarring of the liver. Once a patient's Fibrosis-4 score approaches or exceeds 2.5, a patient is automatically referred to a specialist for evaluation of treatment with anti-viral medications with serial monitoring of lab during treatment to include viral titer levels, genotype of infection, and liver enzymes, as well as abdominal sonograms to rule out hepatoma tumors.

8. Vanwagner's most recent Fibrosis-4 score was 0.85, well below the threshold for an automatic referral for an off-site consult.

9. At all times during his Chronic Care treatment, Vanwagner's liver enzyme levels have remained within the normal levels, and below a Fibrosis-4 score necessary to require an automatic referral.

10. However, despite Vanwagner's well-managed condition, an off-site was placed for Vanwagner on January 31, 2019. On August 15, 2019, Vanwagner received an EGD at Merit Health.

11. At no point during my treatment of Vanwagner have I attempted to prevent Vanwagner from obtaining treatment for his condition. Additionally, it is my medical opinion, based on Vanwagner's low Fibrosis-4 score that Vanwagner has received adequate treatment of his Hepatitis C condition through Chronic Care.

12. I declare under penalty of perjury that the foregoing is true and correct.

Merit Executed on August __, 2018

angela brown, cnp
Angela Brown 8/28/19
angela brown, cnp